



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105



ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY  
1110 West Washington Street  
Phoenix, Arizona 85007

May 3, 2016

Cathy Jerrard  
AFCEC/CIBW  
706 Hangar Road  
Rome, New York 13441

RE: Need for Continued Extraction for Containment at ST-12 Fuels Spill Site, Former Williams Air Force Base, Mesa, AZ.

Dear Ms. Jerrard:

The US Environmental Protection Agency and Arizona Department of Environmental Quality ("The Agencies") previously sent a joint letter dated March 7, 2016 expressing concern that the termination of the Steam Enhanced Extraction System (SEE) at the former ST12 Fuels Spill Site was premature, given the large mass of contaminants still being extracted on a daily basis and the unknown but believed to be significant quantity of LNAPL that could still remains unaddressed at the site. Regardless of our request, the SEE operations were terminated on March 4, 2016. We understand that your contractor, Amec, now intends to terminate the extraction system after only 8 weeks of post steam injection extraction. The regulatory agencies disapprove of termination of the extraction system for the following reasons:

- 1) The mass of mobile LNAPL remaining behind at the site is still unquantified and uncharacterized.
- 2) The site is still hot from SEE operations and contaminants are more mobile.
- 3) The agencies have expressed concern on numerous occasions of the potential for loss of containment of contaminants during the SEE operations, and the concerns have not been addressed through characterization.
- 4) The water table is now within the more transmissive Cobble Zone and without extraction to reverse the gradient there is nothing to prevent contaminants from spreading

widely offsite beyond the reach of the currently proposed enhanced bioremediation (EBR) treatment.

The Agencies request the Air Force continue to extract and contain the contaminants until the concerns identified above have been satisfactorily addressed. The agencies are deeply concerned that failure to contain the plume and prevent contaminant migration now could create a more serious and costly problem for Air Force to address in the future.

We believe that characterization of the remaining contamination should be a priority now. Enclosed is a figure indicating additional areas for priority characterization that were not included in Amec's proposal to help address these concerns on delineating the remaining contamination. It is critical for the success of the Enhanced Bioremediation -project to quantify the initial baseline conditions and initial mass to be addressed for any future modeling effort to determine the effectiveness of the -EBR application. We do not understand Amec's reluctance to address these concerns as expressed in the Base Closure Team (BCT) meeting on April 21, 2016.

Please contact us if you would like to set up a call to discuss.

Sincerely,

Carolyn d'Almeida  
Remedial Project Manager, EPA

Wayne Miller  
Remedial Project Manager, ADEQ

Enclosure